Law Offices

Lightman & Manochi

600 W. Germantown Pike, Suite 400
Plymouth Meeting, PA 19462

Gary P. Lightman +
Glenn A. Manochi *

(215) 545-3000
Telecopier (215) 545-3001

New Jersey
(856) 795-9669
Telecopier (856) 795-9339

+ MEMBER PA NJ DC & FL BARS
*MEMBER PA NJ NY & CT BARS

January 14, 2025

The Honorable John M. Younge, Judge
U.S. District Court for the Eastern District of Pennsylvania
Room 15613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

VIA ECF FILING and
VIA EMAIL: Chambers_Younge@paed.uscourts.gov

   RE: American Environmental Enterprises, Inc. d/b/a TheSafetyHouse.Com v.
     Manfred Sternberg et als
     USDC, ED PA, Civil No. 2022-cv-00688 (JMY)

Dear Judge Younge:

  We represent plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM in the above-referenced case. We write to request a two month postponement of the Final Pre-Trial Conference scheduled in this case for January 30, 2025. Daniel Scully, the principal of plaintiff, and our main contact (and witness) in this case, went into the hospital last week and underwent two major surgeries. He still is in the hospital, and it is our understanding that he expects to be released at the end of this week or next week, and he needs an additional month thereafter to recover. We have spoken to counsel for the Sternberg Defendants, and they do not object to our continuance request.

  Thank you for Your Honor's consideration.

       Respectfully,

       Gary Lightman
       /s/ Gary Lightman_____
       Gary P. Lightman

GPL:no

Lightman & Manochi

The Honorable John M. Younge, Judge
January 14, 2025
Page 2 of 2

cc: Joseph Ross, Esquire Esquire (VIA EMAIL: jross@goldbergsegalla.com)
      Seth Laver, Esquire (VIA EMAIL: slaver@goldbergsegalla.com)
      Daphna Zekaria, Esquire and Sokolski & Zekaria, PC
          (VIA EMAIL: Dzandpeanut@aol.com))
      Gary Weiss and ASOLARDIAMOND, LLC (VIA EMAIL: wgary4109@gmail.com and
      monipair@aol.com)
      Sam Gross and Charlton Holdings Group LLC
        (VIA EMAIL charltonholdinggroupllc@aol.com and Scg1212@gmail.com and
      publicdiamonds@gmail.com and Samrosinc@icloud.com
      client
              (each via email)